



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

February 11, 2022

Transmitted Electronically

Ms. Shari Kolak
Remedial Project Manager
U.S. EPA, Region 5
SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Troy Well Field Unknown Source
Remediation Response
Project Records
Remedial Response
Miami County
555001353012

Subject: Revised Basis of Design Report for Vapor Intrusion Mitigation Systems – Ohio EPA Review

Dear Ms. Kolak:

On January 31, 2022, the Ohio EPA Division of Environmental Response and Revitalization (DERR) received the Revised Basis of Design Report for Vapor Intrusion (VI) Mitigation Systems for the East Troy Contaminated Aquifer Site in Troy, Miami County, Ohio. The revised report incorporates DERR's previous comments, however, DERR is providing the following additional comment for your consideration.

1. Appendix C, Preliminary Cost Estimate, Table C-3. The preliminary cost estimate for operation and maintenance (O&M) of the VI mitigation systems includes 15 annual indoor air sampling events to monitor performance of the sub-slab depressurization (SSD) systems during the 15-year O&M period. The previous cost estimate called for 5 sampling events during the O&M period. The increase from 5 sampling events to 15 events increases the O&M performance monitoring costs from \$624,662 to \$2,648,850. Annual SSD inspections are reasonable but sampling indoor air annually at every structure with an SSD is excessive considering that SSD is a proven and reliable technology. Ohio EPA recommends that SSD performance monitoring be reduced from annual to biennial during the 15-year O&M period.

If you have any questions, please contact me at (937) 285-6065 or by email at Scott.Glum@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Glum", written over a horizontal line.

Scott Glum
Site Coordinator
Division of Environmental Response and Revitalization

SG/rlw

ec: Mark Rickrich, DERR/CO
Gavin Armstrong, DERR/CO